

SEALED

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX.
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2017 DEC 13 AM 10:37

DEPUTY CLERK

UNITED STATES OF AMERICA, *et al.*,
ex rel. PATSY GALLIAN & MONIQUE
JONES,

Plaintiffs,

v.

Civil Action No. 3:16-CV-943-B

DAVITA RX LLC, a wholly owned
subsidiary, DAVITA HEALTHCARE
PARTNERS INC., JANE DOE and JOHN
DOES,

Defendants.

FILED IN SEALED CASE

UNITED STATES OF AMERICA'S NOTICE OF
INTERVENTION FOR PURPOSE OF SETTLEMENT

1. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United States of America (United States) notifies the Court of its intention to intervene in this civil action for the purpose of settlement.

2. The United States requests that only the Complaint, this Notice of Intervention for Purpose of Settlement and any Order resulting therefrom, and all matters occurring in this action after the date of any such Order, be unsealed. The United States requests that all other contents of the Court's file in this matter (including, but not limited to, any applications filed by the United States for an extension of the 60-day investigatory period and any applications to partially lift the seal) remain under seal and not be made public or served upon any defendant.

3. The United States, Defendant, and Relators have executed a settlement agreement. A Joint Stipulation of Dismissal requesting the dismissal of this Action was filed concurrently with this Notice.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY



LISA-BETH C. MELETTA
Assistant United States Attorney
New Jersey Bar No. 020012008
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: 214-659-8600
Facsimile: 214-659-8807
Email: lisa-beth.meletta@usdoj.gov

MICHAEL D. GRANSTON
EDWARD CROOKE
ADAM R. TAROSKY
U.S. Department of Justice
Civil Division


Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2017, a copy of the foregoing pleading and proposed Order were mailed by first class mail to counsel for Relators:

Sara Wyn Kane
Robert J. Valli, Jr.
Valli Kane & Vagnini LLP
600 Old Country Road, Suite 519
Garden City, New York 11530

Larry Taylor
The Cochran Firm
3400 Carlisle Street, Suite 550
Dallas, Texas 75204



LISA-BETH C. MELETTA
Assistant United States Attorney